

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF LOUISIANA
ALEXANDRIA DIVISION**

JERRY MCKINNEY, SR.

CIVIL ACTION NO. 1:19-CV-01339

VERSUS

JUDGE DRELL

**RAPIDES PARISH SHERIFF'S
OFFICE and SHERIFF WILLIAM
EARL HILTON**

MAGISTRATE JUDGE PEREZ-MONTES

PLAN OF WORK

On December 3, 2019, the following individuals participated in a meeting by telephone conference during which this Plan of Work was formulated: (List all parties and their counsel, if any, including e-mail addresses for trial attorneys.)

William B. Most, williammost@gmail.com
201 St. Charles Avenue, Ste. 114 #101, New Orleans, LA 70170
P: 504/509-5023
Attorney for Plaintiff, Jerry McKinney, Sr.

and

H. Bradford Calvit, bcalvit@provosty.com
Provosty, Sadler & deLaunay, APC.
P. O. Box 13530
Alexandria, LA, 71315-3530
P: 318/767-3133; F: 318-445-9377
Attorney for Defendant, William Earl Hilton, Sheriff of Rapides

PART A

Based on the information now reasonably available, the parties have agreed upon the following:

1. 1/30/20 Date disclosures under [Fed. R. Civ. P. 26\(a\)](#) were made or will be made
2. 3/30/20 Final date for adding parties
3. 3/30/20 Final date for filing amended pleadings
4. 9/15/20 Final date for Plaintiff to employ and disclose experts

5. 10/15/20 Final date for Defendants to employ and disclose experts
6. 10/30/20 Deadline for completion of Fact Discovery
7. 11/30/20 Final date for Plaintiff's disclosure of reports of experts
8. 12/30/20 Final date for Defendants' disclosure of reports of experts
9. 1/30/21 Final date for Depositions of Experts
10. 2/15/21 Final date for filing Dispositive Motions

Considering the subjects addressed by Fed. R. Civ. P. 26(f), the parties propose the following changes, limitations, or other matters: NONE.

PART B

The following areas of disagreement, issues, or problems have arisen regarding the information set forth in Section A and/or the participation of counsel/unrepresented parties in the Plan of Work process: NONE.

Respectfully Submitted:

Respectfully Submitted:

PROVOSTY, SADLER & deLAUNAY, APC

LAW OFFICE OF WILLIAM MOST

By: /s/ H. Bradford Calvit
H. BRADFORD CALVIT(#18158)
bcalvit@provosty.com
ELI J. MEAUX (#33981)
emeaux@provosty.com
934 Third Street, Suite 800 (71301)
P.O. Box 13530
Alexandria, LA 71315-3530
P: 318/767-3133 F: 318/767-9588

ATTORNEYS FOR DEFENDANT,
WILLIAM EARL HILTON, SHERIFF
OF RAPIDES

By: /s/ William Most
WILLIAM MOST (#36914)
williammost@gmail.com
DAVID LANSER (#37764)
david.lanser@gmail.com
201 St. Charles Avenue, Ste. 114, #101
New Orleans, LA 70170
P: 504/509-5023

ATTORNEYS FOR PLAINTIFF,
JERRY MCKINNEY, SR.

LASKY MURPHY LLC

By: /s/ Kerry A. Murphy
Kerry A. Murphy, T.A. (La. Bar No. 31382)
Catherine E. Lasky (La. Bar No. 28652)
715 Girod Street, Suite 250
New Orleans LA 70130
P: (504) 603-1500 F: (504) 603-1503
kmurphy@laskymurphy.com

ATTORNEYS FOR PLAINTIFF
JERRY MCKINNEY, SR.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 23rd day of December, 2019, I electronically filed the foregoing PROPOSED PLAN OF WORK with the Clerk of Court by using the CM/ECF system which will send notice of electronic filing to the following:

William A. Most
williammost@gmail.com
David Lanser
david.lanser@gmail.com
201 St. Charles Avenue, Ste. 114, #101
New Orleans, LA 70170
P: 504/509-5023
ATTORNEYS FOR PLAINTIFF
JERRY MCKINNEY, SR.

Kerry A. Murphy, T.A.
Catherine E. Lasky
Megan W. Kelley
LASKY MURPHY LLC
715 Girod Street, Suite 250
New Orleans LA 70130
P: (504) 603-1500 F: (504) 603-1503
kmurphy@laskymurphy.com
ATTORNEYS FOR PLAINTIFF
JERRY MCKINNEY, SR.

I further certify that I have forwarded the foregoing document via facsimile and/or first-class mail to the following non-CM/ECF participants: NONE

/s/ H. Bradford Calvit
H. BRADFORD CALVIT